

Report: CZR0026

21ST JUDICIAL CIRCUIT  
ST LOUIS COUNTY  
CIRCUIT COURT DOCKET SHEET

Date: 17-Jan-2017  
Time: 2:57:58PM  
Page: 2

Case continued from previous page.

16SL-CC03606

THEODA MILLS V ST. LOUIS COUNTY  
GOVERNMENT, ET AL

Security Level: 1 Public

Document ID - 16-SMCC-9346; Served To - GARDNER, SHARON; Server - RINEHART, WILLIAM; Served Date - 28-DEC-16; Served Time - 00:00:00; Service Type - Territory 30; Reason Description - Moved; Service Text - MOVED

**Summons Returned Non-Est**

Document ID - 16-SMCC-9348; Served To - EDWARDS, DONALD; Server - RINEHART, WILLIAM; Served Date - 28-DEC-16; Served Time - 00:00:00; Service Type - Territory 30; Reason Description - Non-est; Service Text - NO LONGER EMPLOYED

**Corporation Served**

Document ID - 16-SMCC-9355; Served To - STENGER, STEVE; Server - RINEHART, WILLIAM; Served Date - 27-DEC-16; Served Time - 00:00:00; Service Type - Territory 30; Reason Description - Served; Service Text - LC

03-Jan-2017 **Summons Returned Non-Est**

Document ID - 16-SMCC-9354; Served To - THEARD, JOYCE; Server - RINEHART, WILLIAM; Served Date - 28-DEC-16; Served Time - 00:00:00; Service Type - Territory 30; Reason Description - Moved; Service Text - N/S - NOT AT THIS LOCATION

Report: CZR0026

21ST JUDICIAL CIRCUIT  
ST LOUIS COUNTY  
CIRCUIT COURT DOCKET SHEETDate: 17-Jan-2017  
Time: 2:57:58PM  
Page: 1

<b>16SL-CC03606</b>	<b>THEODA MILLS V ST. LOUIS COUNTY GOVERNMENT, ET AL</b>	<b>Security Level: 1 Public</b>
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<b>Case Type:</b>	CC Employmnt Discrmntn 213.111	<b>Case Filing Date:</b>	28-Sep-2016
<b>Status:</b>	Pet Filed in Circuit Ct	<b>Disposition Date:</b>	

	<u>Release/Status Change Date</u>	<u>Reason</u>
Judge		
Plaintiff		
Attorney for Plaintiff		
Defendant		
Defendant		
Defendant		
Defendant		
Defendant		

<u>Filing Date</u>	<u>Description</u>
28-Sep-2016	<b>Judge Assigned</b> DIVISION 19 <b>Pet Filed in Circuit Ct</b> Petition. <b>On Behalf Of:</b> THEODA MILLS <b>Filing Info Sheet eFiling</b> <b>Filed By:</b> CELESTINE DOTSON
30-Sep-2016	<b>Judge/Clerk - Note</b> NO SERVICE ADDRESSES FOR DFTS. NO SERVICE FEES. NO SUMMONS ISSUED.
29-Nov-2016	<b>Subpoena Requested</b> Memorandum requesting summons. <b>Filed By:</b> CELESTINE DOTSON <b>On Behalf Of:</b> THEODA MILLS
30-Nov-2016	<b>Summons Issued-Circuit</b> Document ID: 16-SMCC-9346, for GARDNER, SHARON. <b>Service/Attempt Date:</b> 28-Dec-2016 <b>Summons Issued-Circuit</b> Document ID: 16-SMCC-9348, for EDWARDS, DONALD. <b>Service/Attempt Date:</b> 28-Dec-2016 <b>Summons Issued-Circuit</b> Document ID: 16-SMCC-9354, for THEARD, JOYCE. <b>Service/Attempt Date:</b> 28-Dec-2016 <b>Summons Issued-Circuit</b> Document ID: 16-SMCC-9355, for STENGER, STEVE. <b>Service/Attempt Date:</b> 27-Dec-2016
28-Dec-2016	<b>Summons Returned Non-Est</b>



## IN THE 21ST JUDICIAL CIRCUIT COURT, ST. LOUIS COUNTY, MISSOURI

Judge or Division: GLORIA CLARK RENO	Case Number: 16SL-CC03606
Plaintiff/Petitioner: THEODA MILLS	Plaintiff's/Petitioner's Attorney/Address: CELESTINE DOTSON SUITE 301 300 NORTH TUCKER ST. LOUIS, MO 63101
Defendant/Respondent: ST. LOUIS COUNTY GOVERNMENT	Court Address: ST LOUIS COUNTY COURT BUILDING 105 SOUTH CENTRAL AVENUE CLAYTON, MO 63105
Nature of Suit: CC Employmnt Discrimtn 213.111	

(Date File Stamp)

## Summons in Civil Case

The State of Missouri to: JOYCE THEARD  
Alias: 30  
Renew

41 S. CENTRAL AVE  
CLAYTON, MO 63105

**COURT SEAL OF**  
  
ST. LOUIS COUNTY

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

**SPECIAL NEEDS:** If you have special needs addressed by the Americans With Disabilities Act, please notify the Office of the Circuit Clerk at 314-615-8029, FAX 314-615-8739 or TTY at 314-615-4567, at least three business days in advance of the court proceeding.

30-NOV-2016  
Date

Further Information:  
KC

*Joan M. Gilmer*  
Clerk

## Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within thirty days after the date of issue.

I certify that I have served the above summons by: (check one)

- ☐ delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.
- ☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with a person of the Defendant's/Respondent's family over the age of 15 years.
- ☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to \_\_\_\_\_ (name) \_\_\_\_\_ (title)

☒ other NOT WORKING @ THIS LOCATION moved

Served at \_\_\_\_\_ (address)

in \_\_\_\_\_ (County/City of St. Louis), MO, on 12/28/16 (date) at \_\_\_\_\_ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on \_\_\_\_\_ (date).

My commission expires: \_\_\_\_\_ Date

Notary Public

## Sheriff's Fees, if applicable

Summons \$ \_\_\_\_\_

Non Est \$ \_\_\_\_\_

Sheriff's Deputy Salary \$ \_\_\_\_\_

Supplemental Surcharge \$ 10.00

Mileage \$ \_\_\_\_\_ ( \_\_\_\_\_ miles @ \$ \_\_\_\_\_ per mile)

Total \$ \_\_\_\_\_

A copy of the summons and a copy of the petition must be served on each Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

12-30



## IN THE 21ST JUDICIAL CIRCUIT COURT, ST. LOUIS COUNTY, MISSOURI

Judge or Division: GLORIA CLARK RENO	Case Number: 16SL-CC03606
Plaintiff/Petitioner: THEODA MILLS	Plaintiff's/Petitioner's Attorney/Address CELESTINE DOTSON SUITE 301 300 NORTH TUCKER ST. LOUIS, MO 63101
Defendant/Respondent: ST. LOUIS COUNTY GOVERNMENT	Court Address: ST LOUIS COUNTY COURT BUILDING 105 SOUTH CENTRAL AVENUE CLAYTON, MO 63105
Nature of Suit: CC Employmnt Discrmntn 213.111	

**FILED**  
JAN 03 2017  
JOAN M. GILMER  
CIRCUIT CLERK, ST. LOUIS COUNTY  
(Date File Stamp)

## Summons in Civil Case

The State of Missouri to: SHARON GARDNER

41 S. CENTRAL  
CLAYTON, MO 63105Alias: 30.  
Rnew

COURT SEAL OF



ST. LOUIS COUNTY

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

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30-NOV-2016

Date

Further Information:  
KC
  
Clerk

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- ☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to \_\_\_\_\_ (name) \_\_\_\_\_ (title).

☒ other: MOVED NOT WORKING @ THIS LOCATION \_\_\_\_\_ (address)  
Served at \_\_\_\_\_ (County/City of St. Louis), MO, on 12/28/16 (date) at \_\_\_\_\_ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on \_\_\_\_\_ (date)

My commission expires: \_\_\_\_\_ Date

Notary Public

## Sheriff's Fees, if applicable

Summons	\$ _____
Non Est	\$ _____
Sheriff's Deputy Salary	\$ _____
Supplemental Surcharge	\$ 10.00
Mileage	\$ _____ ( _____ miles @ \$ _____ per mile)
Total	\$ _____

A copy of the summons and a copy of the petition must be served on each Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.



*Do work emp*

IN THE 21ST JUDICIAL CIRCUIT COURT, ST. LOUIS COUNTY, MISSOURI

Judge or Division: GLORIA CLARK RENO	Case Number: 16SL-CC03606
Plaintiff/Petitioner: THEODA MILLS	Plaintiff's/Petitioner's Attorney/Address CELESTINE DOTSON SUITE 301 300 NORTH TUCKER ST. LOUIS, MO 63101
Defendant/Respondent: ST. LOUIS COUNTY GOVERNMENT	Court Address: ST LOUIS COUNTY COURT BUILDING 105 SOUTH CENTRAL AVENUE CLAYTON, MO 63105
Nature of Suit: CC Employmnt Discrimtn 213.111	

**FILED**

JAN 03 2017

JOAN M. GILMER  
CIRCUIT CLERK, ST. LOUIS COUNTY

(Date File Stamp)

**Summons in Civil Case**

The State of Missouri to: DONALD EDWARDS

41 S. CENTRAL AVE  
CLAYTON, MO 63105

Alias:

*30-  
Renew*

COURT SEAL OF



ST. LOUIS COUNTY

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

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30-NOV-2016

Date

Further Information:

KC

*Joan M. Gilmer*  
Clerk

**Sheriff's or Server's Return**

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- ☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with a person of the Defendant's/Respondent's family over the age of 15 years.
- ☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to

(name)

(title)

☒ other

*NO LONGER EMPLOYED N/GST*

Served at

in

*STL*

(County/City of St. Louis), MO, on

*12/27/16*

(date) at

*2016 DEC 23 PM 12:52*

(address)

(time)

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on

(date)

(Seal)

My commission expires:

Date

Notary Public

**Sheriff's Fees, if applicable**

Summons

\$

Non Est

\$

Sheriff's Deputy Salary

Supplemental Surcharge

\$

10.00

Mileage

\$

( miles @ \$. per mile)

Total

\$

A copy of the summons and a copy of the petition must be served on each Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.





## IN THE 21ST JUDICIAL CIRCUIT COURT, ST. LOUIS COUNTY, MISSOURI

Judge or Division: GLORIA CLARK RENO	Case Number: 16SL-CC03606
Plaintiff/Petitioner: THEODA MILLS	Plaintiff's/Petitioner's Attorney/Address CELESTINE DOTSON SUITE 301 300 NORTH TUCKER ST. LOUIS, MO 63101
Defendant/Respondent: ST. LOUIS COUNTY GOVERNMENT	Court Address: ST LOUIS COUNTY COURT BUILDING 105 SOUTH CENTRAL AVENUE CLAYTON, MO 63105
Nature of Suit: CC Employmnt Discrimtn 213.111	

FILED

JAN 03 2017

JOAN M. CLARK  
CLERK  
ST. LOUIS COUNTY

(Date File Stamp)

## Summons in Civil Case

The State of Missouri to: STEVE STENGER

41 S. CENTRAL AVE  
CLAYTON, MO 63105

Alias:

30  
Rinew

COURT SEAL OF



ST. LOUIS COUNTY

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

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30-NOV-2016

Date

Further Information:

KC

  
Clerk

## Sheriff's or Server's Return

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I certify that I have served the above summons by: (check one)

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- ☒ (for service on a corporation) delivering a copy of the summons and a copy of the petition to

(name)

(title)

Other

LEFT w/ GLEN F. NORTON CO. COUNSELOR

Served at

41 S CENTRAL

(address)

in

STL

(County/City of St. Louis), MO, on

12/27/16

(date) at

6:52

(time)

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on

(date)

My commission expires:

Date

Notary Public

## Sheriff's Fees, if applicable

Summons

\$

Non Est

\$

Sheriff's Deputy Salary

Supplemental Surcharge

\$

10.00

Mileage

\$

( miles @ \$. per mile)

Total

\$

A copy of the summons and a copy of the petition must be served on each Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.



## IN THE 21ST JUDICIAL CIRCUIT COURT, ST. LOUIS COUNTY, MISSOURI

Judge or Division: GLORIA CLARK RENO	Case Number: 16SL-CC03606
Plaintiff/Petitioner: THEODA MILLS	Plaintiff's/Petitioner's Attorney/Address CELESTINE DOTSON SUITE 301 300 NORTH TUCKER ST. LOUIS, MO 63101
Defendant/Respondent: ST. LOUIS COUNTY GOVERNMENT	Court Address: ST LOUIS COUNTY COURT BUILDING 105 SOUTH CENTRAL AVENUE CLAYTON, MO 63105
Nature of Suit: CC Employmnt Discrmtn 213.111	

(Date File Stamp)

## Summons in Civil Case

The State of Missouri to: SHARON GARDNER

Alias:

41 S. CENTRAL  
CLAYTON, MO 63105

COURT SEAL OF



ST. LOUIS COUNTY

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

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30-NOV-2016

Date

Further Information:

KC

Clerk

## Sheriff's or Server's Return

**Note to serving officer:** Summons should be returned to the court within thirty days after the date of issue.

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- ☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to \_\_\_\_\_

(name) \_\_\_\_\_ (title).

☐ other \_\_\_\_\_

Served at \_\_\_\_\_ (address)

in \_\_\_\_\_ (County/City of St. Louis), MO, on \_\_\_\_\_ (date) at \_\_\_\_\_ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

**Must be sworn before a notary public if not served by an authorized officer:**

(Seal)

Subscribed and sworn to before me on \_\_\_\_\_ (date).

My commission expires: \_\_\_\_\_

Date

Notary Public

## Sheriff's Fees, if applicable

Summons \$ \_\_\_\_\_

Non Est \$ \_\_\_\_\_

Sheriff's Deputy Salary

Supplemental Surcharge \$ 10.00

Mileage \$ \_\_\_\_\_ (\_\_\_\_\_ miles @ \$.\_\_\_\_\_ per mile)

**Total** \$ \_\_\_\_\_

A copy of the summons and a copy of the petition must be served on each Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

THE CIRCUIT COURT OF ST. LOUIS COUNTY, MISSOURI

Twenty First Judicial Circuit

NOTICE OF ALTERNATIVE DISPUTE RESOLUTION SERVICES

**Purpose of Notice**

As a party to a lawsuit in this court, you have the right to have a judge or jury decide your case. However, most lawsuits are settled by the parties before a trial takes place. This is often true even when the parties initially believe that settlement is not possible. A settlement reduces the expense and inconvenience of litigation. It also eliminates any uncertainty about the results of a trial.

Alternative dispute resolution services and procedures are available that may help the parties settle their lawsuit faster and at less cost. Often such services are most effective in reducing costs if used early in the course of a lawsuit. Your attorney can aid you in deciding whether and when such services would be helpful in your case.

**Your Rights and Obligations in Court Are Not Affected By This Notice**

You may decide to use an alternative dispute resolution procedure if the other parties to your case agree to do so. In some circumstances, a judge of this court may refer your case to an alternative dispute resolution procedure described below. These procedures are not a substitute for the services of a lawyer and consultation with a lawyer is recommended. Because you are a party to a lawsuit, you have obligations and deadlines which must be followed whether you use an alternative dispute resolution procedure or not. **IF YOU HAVE BEEN SERVED WITH A PETITION, YOU MUST FILE A RESPONSE ON TIME TO AVOID THE RISK OF DEFAULT JUDGMENT, WHETHER OR NOT YOU CHOOSE TO PURSUE AN ALTERNATIVE DISPUTE RESOLUTION PROCEDURE.**

**Alternative Dispute Resolution Procedures**

There are several procedures designed to help parties settle lawsuits. Most of these procedures involve the services of a neutral third party, often referred to as the "neutral," who is trained in dispute resolution and is not partial to any party. The services are provided by individuals and organizations who may charge a fee for this help. Some of the recognized alternative dispute resolutions procedures are:

**(1) Advisory Arbitration:** A procedure in which a neutral person or persons (typically one person or a panel of three persons) hears both sides and decides the case. The arbitrator's decision is not binding and simply serves to guide the parties in trying to settle their lawsuit. An arbitration is typically less formal than a trial, is usually shorter, and may be conducted in a private setting at a time mutually agreeable to the parties. The parties, by agreement, may select the arbitrator(s) and determine the rules under which the arbitration will be conducted.

**(2) Mediation:** A process in which a neutral third party facilitates communication between the parties to promote settlement. An effective mediator may offer solutions that have not been considered by the parties or their lawyers. A mediator may not impose his or her own judgment on the issues for that of the parties.



**(3) Early Neutral Evaluation (“ENE”):** A process designed to bring the parties to the litigation and their counsel together in the early pretrial period to present case summaries before and receive a non-binding assessment from an experienced neutral evaluator. The objective is to promote early and meaningful communication concerning disputes, enabling parties to plan their cases effectively and assess realistically the relative strengths and weaknesses of their positions. While this confidential environment provides an opportunity to negotiate a resolution, immediate settlement is not the primary purpose of this process.

**(4) Mini-Trial:** A process in which each party and their counsel present their case before a selected representative for each party and a neutral third party, to define the issues and develop a basis for realistic settlement negotiations. The neutral third party may issue an advisory opinion regarding the merits of the case. The advisory opinion is not binding.

**(5) Summary Jury Trial:** A summary jury trial is a non binding, informal settlement process in which jurors hear abbreviated case presentations. A judge or neutral presides over the hearing, but there are no witnesses and the rules of evidence are relaxed. After the “trial”, the jurors retire to deliberate and then deliver an advisory verdict. The verdict then becomes the starting point for settlement negotiations among the parties.

### **Selecting an Alternative Dispute Resolution Procedure and a Neutral**

If the parties agree to use an alternative dispute resolution procedure, they must decide what type of procedure to use and the identity of the neutral. As a public service, the St. Louis County Circuit Clerk maintains a list of persons who are available to serve as neutrals. The list contains the names of individuals who have met qualifications established by the Missouri Supreme Court and have asked to be on the list. The Circuit Clerk also has Neutral Qualifications Forms on file. These forms have been submitted by the neutrals on the list and provide information on their background and expertise. They also indicate the types of alternative dispute resolution services each neutral provides.

A copy of the list may be obtained by request in person and in writing to: Circuit Clerk, Office of Dispute Resolution Services, 7900 Carondelet Avenue, 5th Floor, Clayton, Missouri 63105. The Neutral Qualifications Forms will also be made available for inspection upon request to the Circuit Clerk.

The List and Neutral Qualification Forms are provided only as a convenience to the parties in selecting a neutral. The court cannot advise you on legal matters and can only provide you with the List and Forms. You should ask your lawyer for further information.



## IN THE 21ST JUDICIAL CIRCUIT COURT, ST. LOUIS COUNTY, MISSOURI

Judge or Division: GLORIA CLARK RENO	Case Number: 16SL-CC03606
Plaintiff/Petitioner: THEODA MILLS	Plaintiff's/Petitioner's Attorney/Address CELESTINE DOTSON SUITE 301 300 NORTH TUCKER ST. LOUIS, MO 63101
Defendant/Respondent: ST. LOUIS COUNTY GOVERNMENT	Court Address: ST LOUIS COUNTY COURT BUILDING 105 SOUTH CENTRAL AVENUE CLAYTON, MO 63105
Nature of Suit: CC Employmnt Discrmtn 213.111	(Date File Stamp)

## Summons in Civil Case

**The State of Missouri to: DONALD EDWARDS**  
Alias:  
41 S. CENTRAL AVE  
CLAYTON, MO 63105

**COURT SEAL OF**  
  
**ST. LOUIS COUNTY**

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**30-NOV-2016**  
Date

**Further Information:**  
KC

Clerk

**Sheriff's or Server's Return**

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☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to \_\_\_\_\_ (name) \_\_\_\_\_ (title).

☐ other \_\_\_\_\_

Served at \_\_\_\_\_ (address)  
in \_\_\_\_\_ (County/City of St. Louis), MO, on \_\_\_\_\_ (date) at \_\_\_\_\_ (time).

\_\_\_\_\_  
Printed Name of Sheriff or Server

\_\_\_\_\_  
Signature of Sheriff or Server

**Must be sworn before a notary public if not served by an authorized officer:**

(Seal) Subscribed and sworn to before me on \_\_\_\_\_ (date).

My commission expires: \_\_\_\_\_ Date \_\_\_\_\_ Notary Public

**Sheriff's Fees, if applicable**

Summons	\$ _____
Non Est	\$ _____
Sheriff's Deputy Salary	\$ _____
Supplemental Surcharge	\$ 10.00
Mileage	\$ _____ ( _____ miles @ \$. _____ per mile)
<b>Total</b>	\$ _____

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THE CIRCUIT COURT OF ST. LOUIS COUNTY, MISSOURI

Twenty First Judicial Circuit

NOTICE OF ALTERNATIVE DISPUTE RESOLUTION SERVICES

**Purpose of Notice**

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Alternative dispute resolution services and procedures are available that may help the parties settle their lawsuit faster and at less cost. Often such services are most effective in reducing costs if used early in the course of a lawsuit. Your attorney can aid you in deciding whether and when such services would be helpful in your case.

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**(2) Mediation:** A process in which a neutral third party facilitates communication between the parties to promote settlement. An effective mediator may offer solutions that have not been considered by the parties or their lawyers. A mediator may not impose his or her own judgment on the issues for that of the parties.

CCADM73

**(3) Early Neutral Evaluation (“ENE”):** A process designed to bring the parties to the litigation and their counsel together in the early pretrial period to present case summaries before and receive a non-binding assessment from an experienced neutral evaluator. The objective is to promote early and meaningful communication concerning disputes, enabling parties to plan their cases effectively and assess realistically the relative strengths and weaknesses of their positions. While this confidential environment provides an opportunity to negotiate a resolution, immediate settlement is not the primary purpose of this process.

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## IN THE 21ST JUDICIAL CIRCUIT COURT, ST. LOUIS COUNTY, MISSOURI

Judge or Division: GLORIA CLARK RENO	Case Number: 16SL-CC03606
Plaintiff/Petitioner: THEODA MILLS	Plaintiff's/Petitioner's Attorney/Address CELESTINE DOTSON SUITE 301 300 NORTH TUCKER ST. LOUIS, MO 63101
Defendant/Respondent: ST. LOUIS COUNTY GOVERNMENT	Court Address: ST LOUIS COUNTY COURT BUILDING 105 SOUTH CENTRAL AVENUE CLAYTON, MO 63105
Nature of Suit: CC Employmnt Discrmtn 213.111	(Date File Stamp)

## Summons in Civil Case

The State of Missouri to: JOYCE THEARD

Alias:

41 S. CENTRAL AVE  
CLAYTON, MO 63105

COURT SEAL OF



ST. LOUIS COUNTY

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

**SPECIAL NEEDS:** If you have special needs addressed by the Americans With Disabilities Act, please notify the Office of the Circuit Clerk at 314-615-8029, FAX 314-615-8739 or TTY at 314-615-4567, at least three business days in advance of the court proceeding.

30-NOV-2016

Date

Further Information:

KC

  
Clerk

## Sheriff's or Server's Return

**Note to serving officer:** Summons should be returned to the court within thirty days after the date of issue.

I certify that I have served the above summons by: (check one)

- ☐ delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.
- ☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with \_\_\_\_\_ a person of the Defendant's/Respondent's family over the age of 15 years.
- ☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to \_\_\_\_\_

(name) \_\_\_\_\_ (title).

☐ other \_\_\_\_\_

Served at \_\_\_\_\_ (address)

in \_\_\_\_\_ (County/City of St. Louis), MO, on \_\_\_\_\_ (date) at \_\_\_\_\_ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

**Must be sworn before a notary public if not served by an authorized officer:**

(Seal)

Subscribed and sworn to before me on \_\_\_\_\_ (date).

My commission expires: \_\_\_\_\_

Date

Notary Public

## Sheriff's Fees, if applicable

Summons \$ \_\_\_\_\_

Non Est \$ \_\_\_\_\_

Sheriff's Deputy Salary

Supplemental Surcharge \$ 10.00

Mileage \$ \_\_\_\_\_ ( \_\_\_\_\_ miles @ \$. \_\_\_\_\_ per mile)

Total \$ \_\_\_\_\_

A copy of the summons and a copy of the petition must be served on **each** Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.



THE CIRCUIT COURT OF ST. LOUIS COUNTY, MISSOURI

Twenty First Judicial Circuit

NOTICE OF ALTERNATIVE DISPUTE RESOLUTION SERVICES

**Purpose of Notice**

As a party to a lawsuit in this court, you have the right to have a judge or jury decide your case. However, most lawsuits are settled by the parties before a trial takes place. This is often true even when the parties initially believe that settlement is not possible. A settlement reduces the expense and inconvenience of litigation. It also eliminates any uncertainty about the results of a trial.

Alternative dispute resolution services and procedures are available that may help the parties settle their lawsuit faster and at less cost. Often such services are most effective in reducing costs if used early in the course of a lawsuit. Your attorney can aid you in deciding whether and when such services would be helpful in your case.

**Your Rights and Obligations in Court Are Not Affected By This Notice**

You may decide to use an alternative dispute resolution procedure if the other parties to your case agree to do so. In some circumstances, a judge of this court may refer your case to an alternative dispute resolution procedure described below. These procedures are not a substitute for the services of a lawyer and consultation with a lawyer is recommended. Because you are a party to a lawsuit, you have obligations and deadlines which must be followed whether you use an alternative dispute resolution procedure or not. **IF YOU HAVE BEEN SERVED WITH A PETITION, YOU MUST FILE A RESPONSE ON TIME TO AVOID THE RISK OF DEFAULT JUDGMENT, WHETHER OR NOT YOU CHOOSE TO PURSUE AN ALTERNATIVE DISPUTE RESOLUTION PROCEDURE.**

**Alternative Dispute Resolution Procedures**

There are several procedures designed to help parties settle lawsuits. Most of these procedures involve the services of a neutral third party, often referred to as the "neutral," who is trained in dispute resolution and is not partial to any party. The services are provided by individuals and organizations who may charge a fee for this help. Some of the recognized alternative dispute resolutions procedures are:

**(1) Advisory Arbitration:** A procedure in which a neutral person or persons (typically one person or a panel of three persons) hears both sides and decides the case. The arbitrator's decision is not binding and simply serves to guide the parties in trying to settle their lawsuit. An arbitration is typically less formal than a trial, is usually shorter, and may be conducted in a private setting at a time mutually agreeable to the parties. The parties, by agreement, may select the arbitrator(s) and determine the rules under which the arbitration will be conducted.

**(2) Mediation:** A process in which a neutral third party facilitates communication between the parties to promote settlement. An effective mediator may offer solutions that have not been considered by the parties or their lawyers. A mediator may not impose his or her own judgment on the issues for that of the parties.

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Judge or Division: GLORIA CLARK RENO	Case Number: 16SL-CC03606
Plaintiff/Petitioner: THEODA MILLS	Plaintiff's/Petitioner's Attorney/Address CELESTINE DOTSON SUITE 301 300 NORTH TUCKER ST. LOUIS, MO 63101
Defendant/Respondent: ST. LOUIS COUNTY GOVERNMENT	Court Address: ST LOUIS COUNTY COURT BUILDING 105 SOUTH CENTRAL AVENUE CLAYTON, MO 63105
Nature of Suit: CC Employmnt Discrmtn 213.111	

(Date File Stamp)

## Summons in Civil Case

The State of Missouri to: STEVE STENGER

Alias:

41 S. CENTRAL AVE  
CLAYTON, MO 63105

COURT SEAL OF



ST. LOUIS COUNTY

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

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(name) (title).

☐ other

Served at (address)

in (County/City of St. Louis), MO, on (date) at (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

**Must be sworn before a notary public if not served by an authorized officer:**

(Seal)

Subscribed and sworn to before me on (date).

My commission expires:

Date

Notary Public

## Sheriff's Fees, if applicable

Summons \$

Non Est \$

Sheriff's Deputy Salary

Supplemental Surcharge \$ 10.00

Mileage \$ ( miles @ \$. per mile)

Total \$

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IN THE CIRCUIT COURT ST. LOUIS COUNTY  
STATE OF MISSOURI

Theoda Mills, an individual,

**Plaintiff,**

vs.

St. Louis County Govt.

Sharon Gardner, in her individual and  
official capacity

Donald Edwards, in his individual  
and official capacity, Joyce Theard  
in her individual and official capacity,  
Steve Stenger in his official capacity,

**Defendant,**

CASE NO.: 16SL-CC03606

**MEMORANDUM REQUESTING SUMMONS FOR DEFENDANTS AND  
SERVICE OF INTERROGATORIES AND REQUEST FOR PRODUCTION**

Comes now, Plaintiff Theoda Mills, by and through counsel, Celestine Dotson,  
and requests a summons be provided for each of the Defendants in the above captioned  
case.

The names and addresses of Defendants are as follows:

**Sharon Gardner**

41 S. Central Ave.

Clayton, MO 63105

**Joyce Theard**

41 S. Central Ave.

Clayton, MO 63105

**Donald Edwards**

41 S. Central Ave.

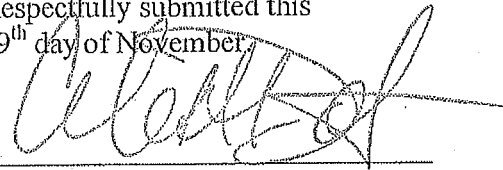
Clayton, MO 63105

**Steve Stenger**

41 S. Central Ave.

Clayton, MO 63105

Respectfully submitted this  
29<sup>th</sup> day of November,

A handwritten signature in black ink, appearing to read 'Celestine Dotson', written over a horizontal line.

By:

Celestine Dotson, #50633  
300 N. Tucker, Ste.301  
St. Louis, MO 63101  
314-454-6543 Phone  
314-241-4943 Fax

IN THE CIRCUIT COURT OF ST. LOUIS COUNTY  
STATE OF MISSOURI

Theoda Mills, an individual ,	)	
Plaintiff,	)	
	)	
vs	)	Jury Demand
	)	
St. Louis County Govt.	)	
Sharon Gardner, in her individual	)	
and Official capacity,	)	
Donald Edwards, in his individual	)	
and Official capacity, Joyce Theard	)	
in her individual and Official Capacity	)	
Steve Stenger in his Official Capacity	)	

PETITION

Theoda Mills, for his petition against St. Louis County, Missouri et al states and alleges as follows:

1. This case arises under the Missouri Human Rights Act, RSMo. Sec. 213.010 et seq., (MHRA). Mills has dutifully filed his complaint and received a "right to sue letter" after exhausting all of his administrative remedies pursuant to the act.
2. Theoda Mills is a resident of St. Louis County., Missouri.
3. St. Louis County employs more than six employees in the State of Missouri such that it is an "employer" under RSMo. Sec. 213.010 (7).
4. Defendants, Sharan Gardner, Donald Edwards, Joyce Theard were acting on behalf of St. Louis County Govt. and were directly involved in the acts and omissions, and were acting in the course and scope of their duties for St. Louis County Govt. such that they were "employers" within the meaning of RSMo. Sec. 213.010 (7).
5. Steve Stenger , as County Executive, is the employer of Theoda Mills within the meaning of RSMo. Sec. 213.010(7) . He has authorized aforementioned defendants to act under his direction and pursuant to his policy and procedure.

5. As the acts of discrimination took place in St. Louis County, Missouri Venue is proper in this court under MHRA.
6. St. Louis County illegally discriminated against Theoda Mills based on his disability, activity protected under the MHRA when they terminated his employment with the St. Louis County Department of Health.
7. St. Louis County requires all employees to comply with local, state and federal laws regarding employment practices.
8. At the time Mr. Mills had been a health inspector with the County for more than five years.
9. Mr. Mills had a severe allergy to shellfish.
10. Mr. Mills was over the age of forty at all times material hereto.
11. The defendants, Sharon Gardener, Donald Edwards and Joyce Theard were all aware of Mr. Mills' condition before he was fired.
12. The County and Gardener, Edwards and Theard refused to accommodate him.
13. Upon information and belief, St. Louis County, and defendants Gardener, Edwards and Theard regarded Mills as having physical impairment which substantially impaired one or more of his major life activities.
14. Despite being aware of Mr. Mills' allergy, his supervisors continually placed him on job assignments that would force him to come into intimate contact with shellfish.
15. On one or more occasions, such contact caused Mr. Mills to be overcome with illness and hospitalized for several days.
16. Following these incidents, Mr. Mills was repeatedly and continually treated differently than younger coworkers not suffering from or having a record of a disability and was made to work in a hostile work environment.
17. His work and performance were routinely criticized and he was subjected to abusive treatment and demotion by St. Louis County and his Supervision.
18. Mr. Mills suffered economic damages and emotional distress damages as a result of the discriminatory conduct of the defendants.

#### COUNT ONE

#### AGE DISCRIMINATION IN VIOLATION OF MHRA

20. Mills restates and incorporates by reference all preceding paragraphs of this petition.
21. As a direct and proximate result of St. Louis County et al's conduct, Mills has sustained damages in the form of lost income, loss of sick time and vacation time that

should have been earned, emotional pain and mental suffering and anguish, inconvenience and loss of enjoyment of life.

22. St. Louis County's conduct was outrageous due to its evil motive and conscious and or reckless disregard for Mills' rights, entitling him to punitive damages.

23. Mills has been forced to engage the services of an attorney and is entitled to an award of attorneys' fees and costs due to defendants' conduct.

Wherefore, Plaintiff, Theoda Mills prays for judgment against St. Louis County, Gardener, Edwards and Theard for his actual and punitive damages, for an award of attorney's fees and costs, and for such other and further relief as the court deems just and equitable in the premises.

#### COUNT TWO

##### DISABILITY DISCRIMINATION IN VIOLATION OF THE MHRA

24. Mills restates and incorporates by reference all preceding paragraphs of this petition.

25. As a direct and proximate result of the St. Louis County and Gardener, Edwards and Theard's conduct, Mills has sustained damages in the form of lost income, including sick time and vacation time that could have been earned and emotional pain including mental suffering and anguish, inconvenience and loss of enjoyment of life.

26. The defendants' conduct was outrageous due to their evil motive and reckless disregard for Mills' rights, entitling him to punitive damages.

27. Plaintiff has been forced to engage the services of an attorney and is entitled to an award of attorneys' fees and costs due to defendants' conduct.

Wherefore, Plaintiff, Mills prays for judgment against the defendants for actual damages, punitive damages, attorneys fees and for such other and further relief as the court deems just and equitable.

#### COUNT THREE

##### VIOLATION OF THE AMERICANS WITH DISABILITIES ACT, 42 USC SECT. 12101, et. Seq. ("ADA").

28. Mills restates and incorporates by reference all preceding paragraphs of this petition.



29. Defendant is an employer within the meaning of 42 USC sect. 2000.e et seq.
30. Mills has satisfied all procedural requirements to commencing this action.
31. Venue is appropriate because the events that gave rise to this complaint occurred in this jurisdiction.
32. Mills is an individual with a physical impairment that substantially limits one or more major life activities.
33. St. Louis County and the codefendants, had a record of Mills' substantially limiting impairment.
34. As a direct and proximate result of Defenants' actions they violated his rights pursuant to the ADA/ADAA in that they failed to make reasonable accommodations to Mr. Mills so that he could retain his position, they demoted Mr. Mills and then terminated him.
35. Plaintiff has been forced to engage the services of an attorney and is entitled to an award of attorneys' fees and costs due to defendants' conduct.

Wherefore, Plaintiff prays for judgment against the defendants in the official and individual capacities for his actual, emotional and punitive damages, for an award of attorney's fees and costs, and for such other and further relief as the court deems just and equitable in the premises.

Respectfully submitted this

28 September 2016

/s/ Celestine Dotson  
Celestine Dotson, #50633  
*Attorney for the Plaintiff*  
300 N. Tucker  
Suite 301  
St. Louis, MO 63101  
Phone 314-454-6543  
Fax 314-241-4943

I certify and attest that the above is a true copy of the original record of the Court in case number 16SL-CC03606 as it appears on file in my office.

Issued

January 17, 2017

**JOAN M. GILMER**, Circuit Clerk  
St. Louis County Circuit Court



By

Sarah E. Lat

Deputy Clerk